

MEAT & WOOL

NEW ZEALAND

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March 3, 2007

VIA ELECTRONIC MAIL

Mr Martin O'Connor
Chief
Standards, Analysis, and Technology Branch
Livestock and Seed Programme
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250.

RE: Marketing Claims for Naturally Raised Livestock

Dear Mr O'Connor

I am pleased to submit these comments on behalf of Meat & Wool New Zealand regarding the development of a draft standard(s) for natural livestock raising. As recognised 'natural' producers with significant trade in agricultural products with the US, New Zealand farmers have a keen interest in the outcome of any debate around standards development and implementation in this area.

Meat and Wool New Zealand is a New Zealand farmer owned and levy funded (check-off) organisation mandated by the New Zealand government under the Commodities Levies Act with the key objective of ensuring the best possible returns for New Zealand sheep, beef and goat producers.

Meat & Wool New Zealand supports the principle of clarifying criteria for use of natural production claims in marketing, providing this is led by consumer demand and is sufficiently flexible to allow supply chains to respond to changing consumer requirements. In this regard a one size fits all categorisation of natural production systems, while having some philosophical appeal, may be too restrictive to meet the needs of the market. The approach already initiated by USDA AMS in developing a grass-fed standard could be extended to cover other areas of 'natural' consumer interest. These areas may include but not be limited to; free range, use of anti-biotics and hormone growth promotants.

In developing a modular approach as described above, careful consideration should be applied to the use of multiple claims under an overarching natural appellation. Particular attention must be paid to streamline producer implementation and ongoing compliance requirements.

AMS are urged to retain a clear differentiation in standards between natural livestock raising practices, and existing organic criteria as defined in the National Organic Programme. Any attempt to develop an 'organic-lite' approach would likely add further confusion to the market, erode existing organic premiums while creating burdensome entry criteria for producers.

Meat & Wool New Zealand is aware that USDA FSIS are working on defining the term natural as it applies to meat and poultry product labelling and will make similar submission to that process. Close liaison between USDA-AMS and USDA-FSIS is urged in the development of natural raising criteria and how such criteria are used in labelling claims presented to the consumer.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kelvin Whall', written in a cursive style.

Kelvin Whall
Regional Manager, North America.